

REMARKS/ARGUMENTS

Independent claims 3, 6, 19, and 21 are identically amended to recite the stocking locations must be within a neighborhood of a primary location and that the parts are normally stocked at more than one of the stocking locations. Support is found in applicants' specification page 8, line 17 - page 9, line 5, and page 10, lines 8 - 15. No new matter is entered.

Applicants wish to point out that the preamble of the amended independent claims is limiting because the plurality of stocking location serves as the antecedent basis for this term in the recited steps of the claims.

Applicants invention as claimed above requires a neighborhood of stocking locations to carry out a neighborhood fill procedure as described on pages 10 - 11, and plans for stocking levels at each stocking location in the neighborhood, taking into account the neighborhood fill procedure while also meeting a part procurement time performance measure specified for each customer.

All of the pending claims, 2 - 4, 6 - 10, 19, 21, 22 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Ettl or Ettl in view of Kalyan. However, as now amended, independent claims 3, 6, 19, and 21 are allowable over Ettl or Ettl in combination with Kalyan for the following reasons.

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Ettl describes a method of optimizing levels of products in a complex supply chain. There are input and output buffers at the manufacturing and distribution nodes in the supply chain network. The method determines inventory levels for the buffers and fill rates to meet service level requirements. The fill rates are optimized based on total inventory cost.

Ettl does not describe a plurality of stocking locations within a neighborhood of a primary location where the parts are normally stocked at more than one of the stocking locations. All of the parts in Ettl's description follow a fixed path as shown in his Figure 1 supply chain network. Ettl, therefore, does not describe the neighborhood fill method of applicants' independent claims 3, 6, 19, and 21.

Nor does Kalyan describe applicants' neighborhood fill method.

Applicants' independent claims 3, 6, 19, and 21 are allowable and such allowance is respectfully requested.

All of the remaining claims depend directly on one of these allowable claims and are therefore also allowable.

Applicants respectfully request withdrawal of the rejection under 35 U.S.C. 103(a) and allowance of all of the pending claims as amended above.

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The Application is deemed in condition for allowance and such action by the Examiner is urged. Should differences remain, however, which do not place one/more of the remaining claims in condition for allowance, the Examiner is requested to phone the undersigned at the number provided below for the purpose of providing constructive assistance and suggestions in accordance with M.P.E.P. Sections 707, 707.07(d) and 707.07(j) in order that allowable claims can be presented, thereby placing the application in condition for allowance without further proceedings being necessary.

Respectfully submitted,

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